

FRIENDS OF BEAUTIFUL PENDLETON COUNTY, Inc.

*PO BOX 218
FRANKLIN, WV 26801*

*To preserve our rich heritage, protect the precious natural environment
and ensure citizens receive responsible, factual information*

May 19, 2011

Attn: Wind Energy Guidelines
Division of Fisheries and Habitat Conservation

U.S. Fish and Wildlife Service
4401 North Fairfax Drive
Mail Stop 4107
Arlington, VA 22203-1610
Attn: Eagle Conservation Plan Guidance
Division of Migratory Bird Management

U.S. Fish and Wildlife Service
4401 North Fairfax Drive
Mail Stop 4107
Arlington, VA 22203-1610
Re: Wind Energy Guidelines Comments and Eagle Conservation Plan Guidance

Comments

Dear Sir/Madam:

We offer these comments pursuant to the Service's Draft Voluntary Land-Based Wind Energy Guidelines ("Wind Guidelines") and the Draft Eagle Conservation Plan Guidance ("Eagle Guidance") (jointly, the "Guidelines"), prepared by the U.S. Fish and Wildlife Service ("FWS" or "Service").

Friends of Beautiful Pendleton County, Inc. (Friends) is a citizen organization in Pendleton County, West Virginia dedicated to preserving the rich heritage, protecting the natural environment and insuring that the residents and landowners of Pendleton County receive responsible, factual information. Protection of our natural environment includes the ecosystem on which our plant and animal species depend.

The current political wind is in favor of industrial wind energy interests, thereby significantly influencing the pressure on the natural environment. If the trend continues, our mountaintops will be covered with a proliferation of industrial wind energy projects with little or no protection for the environmentally sensitive ecosystem.

The Guidelines, must be regulatory and binding on all industrial wind energy facilities throughout the country. Certainly the experience with the interim guidelines since 2003 has demonstrated that a voluntary approach has

not worked. We are considerably concerned with documented attempts by this industry to circumvent existing Federal and state laws through governmental mandates, failures to enforce those laws and the blatant disregard of those laws.

The West Virginia Public Service Commission is responsible for the review and approval or disapproval of applications for siting of industrial wind turbine projects in the State of West Virginia and has published siting application rules and requirements for these industrial projects. These rules do not require the applicants to follow the FWS guidelines and in fact do not require the applicant to consult with FWS. In addition, the WVPSC is not required to work with other state agencies wherein the expertise of the state in these matters resides.

The FWS must require a determination of the cumulative impact of industrial wind energy projects sited throughout the country.

The West Virginia Public Service Commission has made efforts to safeguard and protect the public interest through special provisions in licenses issued to such projects. While these are admirable efforts, these provisions remain inadequate until such time as all appropriate studies are completed concerning the cumulative effects of the industrial wind energy projects sited throughout the mountains. These guidelines should provide mandatory requirements in making cumulative effect studies

Federal and state decision makers must involve the various Federal and state agencies in assessing the impact of industrial wind energy projects. Numerous state laws, regulations, procedures and projects have been enacted or implemented for the protection of the environment and should be given full consideration in decisions to permit industrial wind energy projects. FWS should be working with all appropriate Federal and state agencies in this process.

In conclusion, the negative issues, problems and drawbacks of siting industrial wind turbines on the pristine mountains is not the answer to our nation's need for energy sources. Why are we allowing them to infiltrate our ecologically fragile landscapes and cause huge negative impacts without mandatory guidelines?

Thank you for considering our comments.

A handwritten signature in cursive script, reading "Larry V. Thomas". The signature is written in black ink and is positioned above the printed name of the signatory.

Larry V. Thomas, President